

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Chapter 11
Stream TV Networks, Inc. and Technovative Media, Inc., Debtors. ¹	Bankr. Case No. 23-10763 (MDC)
Stream TV Networks, Inc., <i>et al.</i> Plaintiffs v. Shadron L. Stastney, <i>et al.</i> Defendants.	Adv. Case No. 23-00057 (MDC)

SEECUBIC, INC.'S WITNESS AND EXHIBIT LIST FOR OCTOBER 6, 2023 HEARING

I. WITNESS LIST

SeeCubic, Inc. (“SeeCubic”) may call the following witnesses at the October 6, 2023 on Debtors’ Motion for Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction (ECF No. 30): (i) Shadron Stastney; (ii) Ian Liston; (iii) any witness listed by Debtors or any other party; and (iv) any witness necessary for impeachment and/or rebuttal purposes.

II. EXHIBIT LIST

In addition to the below listed exhibits, SeeCubic reserves the right to utilize any exhibit listed on Debtors’ exhibit list, the exhibit list of any other party, or documents on the docket of

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

the above-captioned or related matters. SeeCubic also reserves the right to utilize any document not listed on the below Exhibit List for impeachment and/or rebuttal purposes.

EXHIBIT NO.	DESCRIPTION
1	Corporate Organizational Chart of the Debtors (Ch. 11 ECF No. 48-5) (ECF No. 47-1)
2	Debtors' Patent Portfolio Filing (Ch. 11 ECF No. 48-1) (ECF No. 47-2)
3	Technology License Agreement (Philips) (ECF No. 47-3)
4	Amendment to Technology Licensing Agreement (Philips) (ECF No. 47-4)
5	Docket, <i>Rembrandt v. Technovative</i> (ECF No. 47-5)
6	Complaint, <i>Rembrandt v. Technovative</i> (ECF No. 47-6)
7	SeeCubic's Answering Brief in Opposition to Rembrandt's Motion for TRO and Preliminary Injunction and Brief in Support of SeeCubic's Cross Motion to Dismiss Plaintiff's Complaint, <i>Rembrandt v. Technovative</i> (ECF No. 47-7)
8	Email Chain From Ian Liston (ECF No. 47-8)
9	Protocol to Operate SeeCubic BV & Ultra-D & Coöperatief U.A. Stream TV BV (ECF No. 47-9)
10	Proposed Terms for Bridge Loan Agreement (2023) (ECF No. 47-10)
11	Dutch Continuance Request (Ch. 11 ECF 286-4) (ECF No. 47-111)
12	Dutch Grant of Continuance (Ch. 11 ECF 286-5) (ECF No. 47-12)
13	Denial of Request to Move Oral Hearing Forward (Ch. 11 ECF No. 286-16) (ECF No. 47-13)
14	Letter Dismissing Directors (Ch. 11 ECF No. 286-14) (ECF No. 47-14)
15	Letter from S. Stastney re Draft Written Resolution (Ch. 11 ECF No. 286-15) (ECF No. 47-15)
16	Judgment, Summary Relief Proceedings Order (June 2023) (ECF No. 47-16)
17	Email Forwarded from C. Michaels Re_ [EXT] FW_ HM project (ECF No. 47-17)
18	Judgment, Summary Relief Proceedings (September 2023) (ECF No. 47-18)
19	Email from D. Bowker Re_[Ext] RE_ Request from Seecubic, Inc. re Dell PowerEdge M640 Servers (ECF No. 47-20)
20	Oct. 5, 2022 Demand Letter for Transfer of Stream/Technovative Assets From SeeCubic to Stream TV (ECF No. 47-21)
21	Oct. 7, 2022 Response Letter to Demand for Transfer of Stream/Technovative Assets From SeeCubic to Stream TV (ECF No. 47-22)

EXHIBIT NO.	DESCRIPTION
22	Email from B. David Re: Stream TV (ECF No. 47-23)
23	Email from B. David Re: Stream TV (ECF No. 47-24)
24	Email from B. David Re: Stream (ECF No. 47-25)
25	Email from B. David Re: Stream SeeCubic Request to Transfer Websites (ECF No. 47-26)
26	Email from M. Brumme Re: Stream TV (ECF No. 47-27)
27	Email from A. Dupre Re: Rule 408 - Discussion with counsel only (ECF No. 47-28)
28	Letter from J. Berkenbosch (ECF No. 47-29)
29	Declaration of S. Stastney (ECF No. 47)
30	Declaration of M. Rajan In Support of Debtors' Motion for TRO, Preliminary Injunction & Permanent Injunction (ECF No. 30-5)
31	Declaration of C. Robertson In Support of Debtors' Motion for TRO, Preliminary Injunction & Permanent Injunction (ECF No. 30-6)
32	Settlement Agreement between Stream TV and Rembrandt (ECF No. 30-3)
33	Settlement Amendment between Stream TV and Rembrandt (ECF No. 30-4)
34	Rembrandt Licensing Covenant (ECF No. 30-5)
35	Second Amended Complaint, <i>Stream TV v. Stastney</i> (D. Del.)
36	Certificate of Service Re Summons and Complaint (ECF No. 14)
37	SeeCubic's Notice Regarding Proceedings In The Netherlands (Ch. 11 ECF No. 286)
38	Written Resolutions of General Meeting of SeeCubic B.V.
39	Declaration of M. Rajan In Support of Stream's Petition Support Emergency Relief and First Day Motions (Ch. 11 ECF No. 48)
40	M. Rajan Whatsapp Messages (Ch. 11 ECF 286-6)
41	Visual Semiconductor, Inc. Website, "Our Team"

SeeCubic reserves the right to supplement and/or amend the foregoing at any time.

Dated: October 6, 2023

Respectfully submitted,

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

/s/ Joseph O. Larkin

Joseph O. Larkin (I.D. No. 206047)
920 N. King Street, One Rodney Square
Wilmington, Delaware 19801
Telephone: (302) 651-3000
Facsimile: (302) 651-3001

- and -

James J. Mazza, Jr. (admitted *pro hac vice*)
Justin M. Winerman (admitted *pro hac vice*)
Rebecca L. Ritchie (admitted *pro hac vice*)
155 North Wacker Drive
Chicago, Illinois 60606-1720
Telephone: (312) 407-0549
Facsimile: (312) 407-8641

- and -

Eben P. Colby (admitted *pro hac vice*)
Marley Ann Brumme (admitted *pro hac vice*)
500 Boylston Street, 23rd Floor
Boston, Massachusetts 02116
Telephone: (617) 573-4800
Facsimile: (617) 573-4822

Counsel for SeeCubic, Inc.